

**From:** Arnold Whitridge  
**Sent:** Tuesday, March 22, 2005 6:54 AM  
**To:** Guivetchi, Kamyar; Dabbs, Paul  
**Subject:** Volume 1 (preview draft) comments

Kamyar, Paul,

In order to guide and measure progress on the course that B-160 is trying to lay out, it seems important to include water use efficiency improvement among the “evaluation criteria”, but I don’t see WUE on the criteria list (Tables 4-5 and 5-2 of Volume 1). To me, and I believe to most prospective readers, the term “new supply” (which does appear on the list) generally has a different meaning than “demand reduction” or “water use efficiency improvement”, and indeed the Update treats WUE and supply augmentation as different topics in several prominent places. Therefore, the intent with the present criteria list is at best ambiguous regarding WUE.

The Update presents water use efficiency as centrally important to a satisfactory water future, and the most promising of several water supply benefits strategies, and a strategy that merits many prestigious summary table dots. Also, WUE improvements are relatively easy to quantify. Under these circumstances, it seems inappropriate to have evaluation of WUE progress be optional, indirect, and/or neglected. Please consider including WUE Improvement as an explicit criterion in Tables 4-5 and 5-2.

I acknowledge that Volume 1 proposes more DWR leadership than I understood when reviewing the Highlights document. The Implementation Plans are somewhat improved, and I now see that “Reform” in the Highlights refers (oddly, in my opinion) to Recommendation #6. Nevertheless, the mechanisms by which the Foundational Actions will be stimulated remain mostly obscure to me, beyond funding allocation guidelines and general B-160 exhortation, and I continue to think that satisfactory results will be more likely if the “Actions” are presented and undertaken as a third Initiative. Also, as I may have commented before, I regard the absence of any commitment from any agency other than DWR as a glaring deficiency in a so-called State Plan.

On a narrower topic, page 3-25 of Volume 1 contains misstatements about the Trinity River. One way to improve the text is like this:

*Trinity River Basin.* The Secretary of the Interior in December 2000 approved significant change in use of Trinity River Basin water. As part of an effort to restore Trinity River fish habitat, the river’s instream flows were increased from 340,000 acre-feet per year (roughly 25 percent of average annual flow at the CVP diversion point on the Trinity River) to an average of 595,000 acre-feet per year. This decision, which would reduce the amount of water available for export from the Trinity River to the Central Valley, was challenged by water and power interests in U.S. District Court in 2001. ~~Implementation of the new flow schedule was delayed until a supplemental EIS/EIR could be completed and approved, which occurred in early 2004.~~ On July 13, 2004, the 9th U.S. Circuit Court of Appeals overturned the ~~previous~~ injunction ~~imposed by the District Court~~, and ruled that the original year 2000 Record of Decision ~~and the supplemental environmental documentation were~~ ~~was~~ adequate. The water allocated to downstream fish flows is now being increased to the new flow schedule, which ranges from a

minimum of 368,600 acre-feet in a critically dry year up to ~~more than 700,000~~ 815,000 acre-feet in an extremely wet year.

The referenced Supplemental EIS/EIR was not in fact completed and approved; rather a draft had been circulated for comment, but work on the SEIS/SEIR was abandoned following the decision from the 9<sup>th</sup> Circuit Court. It's true that the 2000 ROD allocates about 700,000 acre feet to the Trinity River in a "wet" year, but the intent in the paragraph above seems to be to show the maximum ROD allocation, which is 815,000 acre feet in an "extremely wet" year. Based on historical hydrology and the water-year definitions used, about 12% of years are expected to be extremely wet, so 815,000 af will not be an extremely rare annual release to the Trinity. If the number is changed in the Volume 1 text as suggested, it should also of course be changed on page 4 of the Volume 3 report.

If I seem to concentrate on suggestions for improvement, please know that I find much to like and even admire in the Update. Thanks,

Arnold Whitridge